

EXHIBIT C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the
State of New York,

Petitioner,

Index No. 451685/20

-against-

Motion Seq. No.: 002

THE TRUMP ORGANIZATION, INC.,
DJT HOLDINGS LLC, DJT HOLDINGS MANAGING
MEMBER LLC, SEVEN SPRINGS LLC,
ERIC TRUMP, CHARLES MARTABANO,
MORGAN, LEWIS & BOCKIUS, LLP, and
SHERI DILLON,

Respondents.

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**MEMORANDUM OF LAW OF THE TRUMP ORGANIZATION, INC.
DJT HOLDINGS LLC, DJT HOLDINGS MANAGING MEMBER LLC,
SEVEN SPRINGS, LLC AND ERIC TRUMP IN OPPOSITION TO
THE OFFICE OF THE ATTORNEY GENERAL'S PEITION
AND MOTION TO COMPEL COMPLIANCE
WITH INVESTIGATORY SUBPOENAS**

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Eric Trump

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].⁹ Based on these definitions, [REDACTED] fall well outside the scope of the OAG's investigation.

Indeed, during "meet and confer" communications with TTO, the OAG confirmed to counsel for TTO that the OAG [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

TTO has fully cooperated with the OAG's investigation during the last 18 months, having produced voluminous records and multiple witnesses, interspersed with numerous meet-and-confer sessions. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁹ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dated: New York, New York
September 16, 2020

/s/ *Amy Carlin*

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